LOUISIANA DEPARTMENT OF AGRICULTURE & FORESTRY
MIKE STRAIN DVM
COMMISSIONER

January 26, 2018

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Subject: 2018 Section 18 Specific Emergency Exemption re-certification request for the use of Transform® WG to control the sugarcane aphid (*Melanaphis sacchari*) on sorghum in Louisiana.

Dear Ms. Maignan:

The Louisiana Department of Agriculture and Forestry (LDAF) hereby requests a specific exemption recertification under the provisions of Section 18 of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, for the use of Transform WG (EPA Reg. No. 62719-625) to help control the sugarcane aphid (*Melanaphis sacchari*) in sorghum production in 2018.

According to the authorization letter for 17LA02, the EPA determined that this use is eligible for the streamlined review process in 2018 under the re-certification program (40 CFR 166.20(b)(5)). As a result, this correspondence is being submitted to satisfy the recertification requirements. The emergency condition continues to exist as outlined in 2017, and the information submitted in the 2017 application is still representative of the emergency situation. For the 2018 production year, the LSU AgCenter anticipates the sorghum acreage to be approximately 50,000 acres. The intended use season is from April 1 to October 31.

According to an LSU AgCenter Entomologist, Dr. Sebe Brown, the specific emergency exemption that was authorized for 2017 was effective in controlling the sugarcane aphid, and Transform WG provided a high level of efficacy and yield protection while

preserving beneficial insect populations. This use is needed again for the 2018 production season to aid in controlling the sugarcane aphid in sorghum production.

If you have any questions or need additional information concerning this request, please contact me or Scotty May, Pesticide Registration Program Coordinator, at 225-952-8047.

Sincerely,

Kevin Wofford, Director
Pesticide and Environmental Programs
Agricultural and Environmental Sciences
Louisiana Department of Agriculture and Forestry
Phone: 318-345-7595
E-mail: kwofford@ldaf.state.la.us

KW/sm

OFFICE OF SEBE BROWN Ph.D,

January 17, 2018

To whom it may concern:

In July of 2013, Louisiana discovered a new species of aphid in grain sorghum not previously noted in the mid-southern region to be a pest of grain sorghum. On further examination it was identified as sugarcane aphid, *Melanaphis sacchari*. In 2017, Louisiana producers planted nearly 20,000 acres of grain sorghum. Although only thirteen parishes reported sugarcane aphids in 2013, every parish with grain sorghum planted encountered sugarcane aphids in 2014-2017. Entomologists in Louisiana conducted several trials during 2013-17 to determine potential yield loss from this invasive pest. Yield losses ranged from 21-100% depending on infestation timing and duration.

The LSU AgCenter Cooperative Extension Service witnessed numerous producer fields that suffered severe economic loss. Sugarcane aphids are now in nearly every sorghum producing state since first discovered late in the 2013 growing season and have expanded to states in the West as well. The capacity of this pest to spread through the landscape and infest new areas is astonishing. We fully anticipate having to deal with this pest in 2018. The emergency exemption granted in 2014-2017, in the state of Louisiana, prevented catastrophic levels of loss by grain sorghum producers. Sorghum breeders are currently working on resistant lines while university researchers are investigating cultural practices such as planting date and plant population. However, there are no proven management options other than incorporating multiple insecticide modes of action until host plant resistance is incorporated into commercial varieties and cultural methods are validated. The data provided in the submitted Section 18 in 2016 clearly demonstrates that yield loss from this pest greatly exceeds 20% of gross revenue. Currently there is only one alternative product on the market and there is the potential for aphid exposure due to gaps in the timeline where the label does not allow sequential application, PHI, or simply there may be more seasonal exposure than the maximum number of seasonal applications allowed.

Transform provides a high level of efficacy and yield protection against sugarcane aphids while also preserving beneficial insect populations. Louisiana received Transform in 2017 for use against sugarcane aphids through a Section 18 emergency exemption and the product was used successfully with no adverse effects to the environment or local beekeepers. This indicates that farmers have demonstrated that this product can be used in accordance to labeled directions to manage sugarcane aphids in a sustainable manner. We certify that the conditions set forth in 2017 will remain consistent with expectations for the 2018 growing season and are identical in nature. We are not aware of new or alternative management strategies that are different than in the preceding year. We respectively ask that the EPA consider granting the exemption of Transform for the use year of 2018 described in the same manner as the previous submission for use in 2017. Thank you.

Sincerely,

Sebe Brown Ph.D

LSU AgCenter Extension Entomologist

AGRICULTURAL EXPERIMENT STATION
Northeast Region Station
Macon Ridge Branch
212 B Macon Ridge Road
Winnsboro, LA 71295

Dow AgroSciences

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Indianapolis, IN 46163

dowagro.com

December 5, 2017

Mr. Scotty May
Louisiana Department of Agriculture & Forestry
Pesticide & Environmental Programs
P.O. Box 91081
5825 Florida Boulevard, Suite 1023
Baton Rouge, LA 70821-9081

Re: Support letter for Transform™ WG Section 18 on sorghum

Dear Mr. May,

Per your request, this letter is to confirm that Dow AgroSciences supports the pursuit of a Section 18 emergency exemption for Transform WG to control sugarcane aphid in sorghum in the state of Louisiana. Transform WG has provided excellent efficacy against sugarcane aphid in previous use under Section 18 exemptions, with no negative impacts on non-target insects. It represents a new class of chemistry with a novel mode of action, and controls pests resistant to other classes of chemistry.

If you have questions, please do not hesitate to call me.

Sincerely,

Jamey Thomas, Ph.D.
US Regulatory Manager
Dow AgroSciences

cc: Tami Jones-Jefferson, DAS

Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268-1054 USA

Transform® WG

EPA Reg. No. 62719-625

For Control of Sugarcane Aphid (*Melanaphis sacchari*) in Sorghum
Section 18 Emergency Exemption

File symbol: XXXXXX

FOR DISTRIBUTION AND USE ONLY IN LOUISIANA UNDER SECTION 18 EMERGENCY EXEMPTION
This Section 18 Emergency Exemption is effective XXXXX and expires XXXXX.

- This labeling must be in the possession of the user at the time of application.
- It is in violation of federal law to use this product in a manner inconsistent with its labeling.
- Read the label affixed to the container for Transform® WG insecticide before applying. Carefully follow all precautionary statements and applicable use directions.
- Any adverse effects resulting from the use of Transform WG under this emergency exemption must be immediately reported to the Louisiana Department of Agriculture and Forestry.

Environmental Hazards Statement: This product is highly toxic to bees exposed through contact during spraying and while spray droplets are still wet. This product may be toxic to bees exposed to treated foliage for up to 3 hours following application. Toxicity is reduced when spray droplets are dry. Risks to managed and native pollinators from contact with pesticide spray or residues can be minimized when applications are made before 7:00 a.m. or after 7:00 p.m. local time or when the temperature is below 55 degrees Fahrenheit (°F) at the site of application.

Directions for Use

Pests and Application Rates:

Pests	Transform WG (oz/acre)	Comments
Sugarcane aphid	0.75 – 1.5 (0.023 – 0.047 lb ai/acre)	Use a higher rate in the rate range for heavy pest populations.

Application Timing: Treat in accordance with local economic thresholds. Consult your Dow AgroSciences representative, cooperative extension service, certified crop advisor or state agricultural experiment station for any additional local use recommendations for your area.

Application Method: Control of sugarcane aphid may be contingent on thorough coverage to the crop. Use sufficient water to get full coverage of the canopy. It is recommended that a minimum of 5 gallons of water be applied by air.

Spray Drift Management: Applications are prohibited above wind speeds of 10 miles per hour (mph). Applications must be made with medium to coarse spray nozzles (i.e., with median droplet size of 341 µm or greater).

Restrictions:

- **Preharvest Interval:** Do not apply within 14 days of grain or straw harvest or within 7 days of grazing, or forage, fodder, or hay harvest.
- A restricted entry interval (REI) of 24 hours must be observed.
- Do not make more than two applications per acre per year.
- **Minimum Treatment Interval:** Do not make applications less than 14 days apart.
- Do not apply more than a total of 3.0 oz of Transform WG (0.09 lb ai of sulfoxaflor) per acre per year.
- Do not apply product ≤ 3 days pre-bloom or until after seed set.

R396-196
Approved: __/__/__
Replaces 396-160